Message

From: Kirk, Cassandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2F3BD61E1448445B86A8FB5A488BE801-KIRK, CASSA]
Sent: 1/25/2022 9:38:25 PM
To: Milewski, Elizabeth [Milewski.Elizabeth@epa.gov]
CC: Ortiz, Nina [Ortiz.Nina@epa.gov]
Subject: RE: comments with references

Thanks Elizabeth!

Do the numbers in parens represent actual citations or parts of documents? I would like to check out the studies they are referring to so if you could send the letters that contain the citations or citations from them so we could pull the papers, that would be great!

Also, do either of you know whether the pet food issue was addressed for the first EUP? I recall we got pretty much the same comment so I thought we dealt with it then?

Cassie

From: Milewski, Elizabeth <Milewski.Elizabeth@epa.gov>
Sent: Tuesday, January 25, 2022 4:10 PM
To: Kirk, Cassandra <kirk.cassandra@epa.gov>
Cc: Ortiz, Nina <Ortiz.Nina@epa.gov>
Subject: RE: comments with references

OOPs – I should have said that 0397 sprinkles its comments on a topic in several places in their letter. Here is an exmpale:

GMO Free Florida rebutting Oxitec's statement "for the amount of tetracyclines needed to have high survival rates, they were unable to find these levels in sewage in the scientific literature throughout the world(9)", added that:

> ". . . , studies do exist suggesting this level exists in slurry samples(20), tetracycline at these levels are in some municipal sewage(21), and prescribed doses of tetracycline for medicating animal drinking water(22)." (0397 p. 18)

From: Milewski, Elizabeth
Sent: Tuesday, January 25, 2022 3:40 PM
To: Kirk, Cassandra <kirk.cassandra@epa.gov>
Cc: Ortiz, Nina <Ortiz.Nina@epa.gov>
Subject: comments with references

That deal with tetracycline sources, and that give references that support an argument that mosquito will breed in less than clean water.

GMO Free Florida is attachment 0397. Pages 17-20 deal directly with the issue but it is mentioned elsewhere in the document.

GeneWatch UK for the amendment/extension is attachment 0383; for the original EUP is 0335. I include 0335 here because 0383 references it. Pages 5-6 in 0383 deal directly with the issue.

The Center for Food Safety (0396) also raises similar concerns but does not seem to have references supporting their point. Let me know if you want to see that one as well. (pages 5-6)

Friends of the Earth (0394) also raises these concerns but does supply one reference:

Hribar, L. J., Vlach, J. J., Demay, D. J., James, S. S., Fahey, J. S., and Fussell, E. M. 2004. Mosquito larvae (Culicidae) and other Diptera associated with containers, storm drains, and sewage treatment plants in the Florida Keys, Monroe County, Florida. Florida Entomol. 87: 199–203.

Let me know if you want to see 0394 as well.

Let me know if this meets your needs.

Inputting all of this together, it appears that commenters' concerns are not only areas where fairly large amounts of tetracycline is being used, e.g., CAFO and citrus groves, but also what one might consider a very small point source. Such as a pet dish on a porch that might have tetracycline in it. Don't laugh - one of my neighbors was complaining about all the mosquitoes on his patio and wanting chemical control. I went over to check it out and discovered multiple small reservoirs in which Aedes can breed, including pet dishes. In an area where there is frequent rain, it is hypothetically possible for a tet-containing dish to be supportive of female development for the 8-10 day Aedes life cycle.

Another reason to ensure adequate testing for females.